



Law Offices of Bennet & Bennet, PLLC

Maryland

6124 MacArthur Boulevard
Bethesda, Maryland 20816
Tel: (202) 371-1500
Fax: (202) 371-1558
www.bennetlaw.com

District of Columbia

5185 MacArthur Boulevard, NW, Suite 729
Washington, DC 20016

Caressa D. Bennet

Michael R. Bennet

Marjorie G. Spivak*

Howard S. Shapiro

* Admitted in DC & PA Only

Daryl A. Zakov[^]

Robert A. Silverman

Erin P. Fitzgerald

Frederick W. Giroux[#]

[^]Admitted in DC & WA Only

[#]Admitted in DC & MA Only

August 3, 2017

Via ECFS

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Panhandle Telecommunication Systems, Inc.
E911 Location Accuracy Implementation Plan and Progress Report
PS Docket No. 07-114

Dear Ms. Dortch,

Pursuant to 47 C.F.R. § 20.18(i)(4)(i)-(ii), submitted herewith on behalf of Panhandle Telecommunication Systems, Inc., is its E911 location accuracy implementation plan and progress report.

Should you have any questions, please contact undersigned counsel.

Sincerely,

/s/ Michael R. Bennet

Michael R. Bennet

Attachment

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

)

)

Wireless E911 Location Accuracy Requirements) PS Docket No. 07-114

Panhandle Telecommunication Systems, Inc. E911 Implementation Plan and Initial Progress Report

Panhandle Telecommunication Systems, Inc. ("Panhandle"), pursuant to Section 20.18(i)(4)(i)-(ii) of the Federal Communications Commission's ("FCC" or "Commission") rules, hereby submits its location accuracy implementation plan and initial progress report.

Panhandle is a small non-nationwide CMRS carrier providing service in Oklahoma. Panhandle does not provide service in any of the top 50 CMAs. Panhandle entered into a services agreement with West Safety Services ("West") for infrastructure, software and services to enable Panhandle to provide enhanced 911 ("E911") location data to E911-capable public safety answering points ("PSAPs"). Panhandle has utilized the Location Performance Management ("LPM") tool provided by West to ensure compliance with location accuracy requirement of Section 20.18(i)(2)(i)(B)(1) of the FCC's rules. The LPM allows users to optimize network accuracy and identify areas for improvement. Its performance monitoring and reporting tools identify location performance issues and provide reports that allow for auditing key performance indicators and call results and analyze location server performance. The LPM provides live call data reports, 50 meter accuracy reports, and PSAP reports consistent with ATIS's 05000031 recommendation.

In Texas County, Oklahoma, the only county served by Panhandle where the PSAP has requested and is capable of receiving and utilizing Phase I and Phase II E911 data, Panhandle exceeds the 50% location accuracy benchmark which is scheduled to go into effect in April 2018. To the extent it deploys a commercially operating VoLTE platform in its network, and is therefore required to meet the subsequent 70% and 80% accuracy benchmarks, Panhandle, through use of the LPM tool, plans on taking whatever additional steps are necessary to achieve the required degree of accuracy. Because Panhandle does not provide service in any of the top 50 CMAs, it is not required to provide vertical z-axis location information.



Travis Clark

Plant Manager

Date: August 1, 2017